

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** : **CHAPTER 13**  
**Omar Z. Fisher** :  
**Debtor** : **BANKRUPTCY NO.: 19-14119-amc**

**RESPONSE TO MOVANT'S MOTION FOR RELIEF**

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Movant's allegation contains factual averments contained within documents, filed by the Movant, and on record before the Court. Debtor does not attest to the authenticity or the veracity of said documents. Said documents speak for themselves. The facts contained in corresponding paragraph are therefore denied. .
4. Admitted.
5. Admitted.
6. Should Debtor owe any post-petition arrears, said arrears will be cured promptly.
7. Should Debtor owe any post-petition arrears, said arrears will be cured promptly.
8. Denied. The amounts alleged in Movant's allegation are inaccurate.
9. Denied. Debtor does not have the requisite knowledge to attest to the veracity of the corresponding paragraph, as said paragraph was omitted from the Movant's pleading.
10. Denied. The averments set forth in this Paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.
11. Denied.

WHEREFORE, Debtor prays that the Movant's Motions be denied.

Date: October 29, 2019

/s/ Brandon J. Perloff  
Brandon J. Perloff Esquire.  
Attorney for Debtor